

Gary Lear/DC/USEPA/US

01/07/2013 04:53 PM

To Timothy Sharac

cc Melissa Puchalski, Richard Haeuber

bcc

Subject Fw: EPA exceptional event ruling

Tim, After reading through 40 CFR 50.1(j), the KDHE application (<http://www.kdheks.gov/bar/air-monitor/exceptevent/exevent.html>) and the comments from R7 and Kansas Sierra Club,

I guess more to the point, after reading their lengthy and well-thought out comments,

My suggestion as to how we respond now is that

Also, since we agreed to include Konza Prairie people in the next call, I would want to talk with John Blair to make sure the Nature Conservancy (as a co-sponsor of the site) was aware of the purpose of the call.

(j) *Exceptional event* means an event that affects air quality, is not reasonably controllable or preventable, is an event caused by human activity that is unlikely to recur at a particular location or a natural event, and is determined by the Administrator in accordance with 40 CFR 50.14 to be an exceptional event. It does not include stagnation of air masses or meteorological inversions, a meteorological event involving high temperatures or lack of precipitation, or air pollution relating to source noncompliance.

and

50.14 (3) EPA shall exclude data from use in determinations of exceedances and NAAQS violations, where a State demonstrates to EPA's satisfaction that emissions from prescribed fires caused a specific air pollution concentration in excess of one or more national ambient air quality standards at a particular air quality monitoring location and otherwise satisfies the requirements of this section provided that such emissions are from prescribed fires that EPA determines meets the definition in § 50.1(j), and provided that the State has certified to EPA that it has adopted and is implementing a Smoke Management Program or the State has ensured that the burner employed basic smoke management practices. If an exceptional event occurs using the basic smoke management practices approach, the State must undertake a review of its approach to ensure public health is being protected and must include consideration of development of a SMP.

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----- Forwarded by Gary Lear/DC/USEPA/US on 01/07/2013 04:18 PM -----

From: "John Blair" <jblair@ksu.edu>
To: Gary Lear/DC/USEPA/US@EPA
Date: 01/04/2013 12:51 PM
Subject: FW: EPA exceptional event ruling

Gary,

I just received this email today. It seems very relevant to our discussion yesterday regarding ozone levels recorded at the Konza Prairie site. Given the concurrent exceedances in Wichita and Kansas City in April 2011, it seems most likely that this was a regional phenomenon and not due to local burning near the Konza site. In addition, when I looked at 8-hour ozone levels from the Konza site, the highest levels recorded were generally in the summer, and were not related to times when local burning takes place (we have a detailed record of burning on the Konza site). Thought this info might be useful if you have additional contacts from Region 7 or KDHE personnel.

Sincerely,

John Blair

-----Original Message-----

From: Carol Blocksom [mailto:blocksom@ksu.edu]
Sent: Friday, January 04, 2013 11:10 AM
To: Dan Devlin; Bill Schapaugh; Ken Odde; Jeff Morris; Dave Lambert; Arthur Selman; Daryl Buchholz; Gary Pierzynski; Randy Griffith; Bill Herndon; Kevin Dhuyvetter; Marsha Landis; Kris Boone; Steve Watson; Jeff Morris; Gloria Holcombe; Duncan, Stu; Shoup, Doug; egtowne@ksu.edu; skp@ksu.edu; eminton@ksu.edu; rmaghir@ksu.edu; kcolson; hartmanj@ksu.edu; Lee, Charlie; Blasi, Dale; Harmon, Keith; Knapp, Mary; kpprice@ksu.edu; owensby@ksu.edu; jbriggs1@ksu.edu; jblair@ksu.edu; rlmohler@ksu.edu; sstaggen@ksu.edu; jay.ham@colostate.edu; sgraham@k-state.edu; jmurphy@ksu.edu; jdavidso@k-state.edu; mholder@ksu.edu; whfick@ksu.edu; dgoodin@ksu.edu
Subject: EPA exceptional event ruling

All-

Last week the EPA made its final ruling on KDHE's request for an exceptional event flag for the air quality standard exceedances in April 2011. A KDHE press release is attached to this email.

Carol

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[attachment "KDHE EPA Exceptional Events Concurrence_April 2011 Air Quality.pdf" deleted by Gary Lear/DC/USEPA/US]